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8 Attorneys for Plaintiff Carolyn A. Dye,  
9 Chapter 7 Trustee

10 UNITED STATES BANKRUPTCY COURT

11 CENTRAL DISTRICT OF CALIFORNIA

12 LOS ANGELES DIVISION

13 In re:  
14 URBAN COMMONS, LLC,  
15 Debtor.

16 Case No. 2:21-bk-13523 WB  
17 Chapter 7

18 CAROLYN A. DYE, Chapter 7  
19 Trustee,

Adv. Proc. No. 2:23-ap-01302 WB

20 Plaintiff,

STIPULATION CONTINUING PRETRIAL  
CONFERENCE

21 v.

22 Pretrial Conference Hearing:

23 Date: April 15, 2024  
24 Time: 2:00 PM  
25 Place: 255 E. Temple St.  
26 Los Angeles CA 90012  
27 Ctrm: 1375

28 FWREF NASHVILLE AIRPORT, LLC, a  
Delaware limited liability  
company

Defendant.

29 This Stipulation Continuing Pretrial Conference is entered  
30 into between Plaintiff, Carolyn A. Dye, as Chapter 7 Trustee of  
31 the estate of Urban Commons, LLC (the "Plaintiff") and Defendant  
32 FWREF Nashville Airport, LLC (the "Defendant"), by and  
33 through their respective counsel.

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1 By this Stipulation, the parties seek to continue the  
2 pretrial conference currently set for April 15, 2025, at 2:00 p.m.  
3 to a date after June 15 2025, convenient to the Court.

4 The parties have settled this matter and are preparing the  
5 settlement agreement memorializing their agreement. The  
6 process has taken longer than anticipated because not only does it  
7 involve this adversary proceeding but also, if possible, other  
8 related state court and appellate court matters in which  
9 affiliates of the Debtor are in litigation with the Defendant in  
10 this matter. The parties are attempting to craft a settlement  
11 that will resolve all those matters. For these reasons, the  
12 parties request a 60 day continuance to finalize their drafting of  
13 the relevant settlement documents and for the Trustee to prepare  
14 and file a compromise motion.

16 | SO STIPULATED

RESPECTFULLY SUBMITTED THIS 14<sup>th</sup> DAY OF APRIL, 2025,

**LEONARD PEÑA**  
18 Attorneys for Carolyn A. Dye,  
19 Chapter 7 Trustee of Urban Commons, LLC

20 Date: April 14, 2025

**SARAH B. MILLER**  
*Attorneys for the Defendant*  
*Admitted Pro Hac Vice*

Date: April 14, 2025

## **PROOF OF SERVICE OF DOCUMENT**

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is: 479 South Marengo Ave., Pasadena, CA 91101

A true and correct copy of the foregoing document entitled (*specify*): **STIPULATION EXTENDING DISCOVERY DEADLINE AND CONTINUING PRETRIAL CONFERENCE** will be served or was served (a) on the judge in chambers in the form and manner required by LBR 5005-2(d); and (b) in the manner stated below:

**1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF):**  
Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On (date) 4/14/2025, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

Service information continued on attached page

**2. SERVED BY UNITED STATES MAIL:**

On (date) 4/14/2025, I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

The Honorable Julia W. Brand  
United States Bankruptcy Court  
Edward R. Roybal Federal Building and Courthouse  
255 E. Temple Street, Suite 1382  
Los Angeles, CA 90012

Service information continued on attached page

**3. SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE**

**TRANSMISSION OR EMAIL** (state method for each person or entity served): Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on (date) \_\_\_\_\_, I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

Service information continued on attached page

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

4/14/2025 NOEMI SANDOVAL  
Date Printed Name

/S/ NOEMI SANDOVAL  
*Signature*

1 **TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF):**

2 Andrew W Caine on behalf of Defendant FWREF Nashville Airport, LLC, a Delaware limited liability  
3 company acaine@pszjlaw.com

4 Carolyn A Dye (TR) trustee@cadye.com, c197@ecfcbis.com;atty@cadye.com

5 Jeffrey P Nolan on behalf of Defendant FWREF Nashville Airport, LLC, a Delaware limited liability  
6 company jnolan@pszjlaw.com

7 Leonard Pena on behalf of Plaintiff Carolyn A Dye lpena@penalaw.com,

8 penasomaecf@gmail.com;penalr72746@notify.bestcase.com

9 United States Trustee (LA) ustpregion16.la.ecf@usdoj.gov

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